

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

All Cases Noted on Attached Exhibit

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND ORDER DISMISSING WITH
PREJUDICE CLAIMS
PURSUANT TO FLORIDA CVS SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Appendix A (collectively, “Dismissing Plaintiffs”) and Defendants CVS Health Corporation, CVS Pharmacy, Inc., CVS Orlando FL Distribution, L.L.C., CVS Vero FL Distribution, L.L.C., CVS TN Distribution, L.L.C., CVS Rx Services, Inc., CVS Indiana, L.L.C., Holiday CVS, L.L.C., CVS Health Solutions, L.L.C., and Omnicare Distribution Center, L.L.C. (together, “CVS”¹) that, pursuant to the election of each Dismissing Plaintiff to participate in the CVS Settlement Agreement attached hereto as Appendix B, all claims of each Dismissing Plaintiff against any CVS entity that is a defendant in the actions

¹ The CVS Settlement Agreement is between the State of Florida, Office of Attorney General, on the one hand, and CVS Health Corporation and CVS Pharmacy, Inc., on the other, but the Settlement Agreement provides for participation by Dismissing Plaintiffs conditioned on their agreement, among other things, to release and dismiss their claims against all “Releasees,” which includes CVS Orlando FL Distribution, L.L.C., CVS Vero FL Distribution, L.L.C., CVS TN Distribution, L.L.C., CVS Rx Services, Inc., CVS Indiana, L.L.C., Holiday CVS, L.L.C., CVS Health Solutions, L.L.C., and Omnicare Distribution Center, L.L.C.. Settlement Agreement § A(bb) and A(cc) (attached as Appendix B). To the extent the parties discover that any Released Claim of any Dismissing Plaintiff remains pending against any Releasee following filing of this stipulation, the parties shall stipulate to the dismissal of those claims in a subsequent filing.

listed in Appendix A are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs.

Dated: May 25, 2022

Respectfully submitted,

Agreed as to form and substance:

CVS

/s/ Eric R. Delinsky

Eric R. Delinsky
Alexandra W. Miller
Graeme W. Bush
Paul B. Hynes, Jr.
ZUCKERMAN SPAEDER LLP
1800 M Street NW, Suite 1000
Washington, DC 20036
(202) 778-1800
E-mail: edelinsky@zuckerman.com
E-mail: smiller@zuckerman.com
E-mail: gbush@zuckerman.com
E-mail: phynes@zuckerman.com

*Counsel for CVS Health, CVS
Pharmacy, Inc.,, CVS Orlando FL
Distribution, L.L.C., CVS Vero FL
Distribution, L.L.C., CVS TN
Distribution, L.L.C., CVS Rx Services,
Inc., CVS Indiana, L.L.C., Holiday
CVS, L.L.C., CVS Health Solutions,
L.L.C., and Omnicare Distribution
Center, L.L.C.*

/s/ Mark J. Dearman

Mark J. Dearman (FL Bar No. 982407)
ROBBINS GELLER RUDMAN
& DOWD LLP
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
(561) 750-3000
(561) 750-3364 (Fax)
mdearman@rgrdlaw.com

*Counsel for Brevard County (1:19-op-45064-
DAP)
Broward County (1:18-op-45332-DAP)
City of Pompano Beach (1:19-op-45087-
DAP)
City of Coconut Creek (1:19-op-45089-DAP)
City of Delray Beach (1:18-op-45051-DAP)*

/s/ Matthew S. Daniel

Matthew S. Daniel
FERRER POIROT & WANSBROUGH
2603 Oak Lawn Ave., Suite 300
Dallas, TX 75219
(214) 521-4412
(866) 513-0115 (Fax)
mdaniel@lawyerworks.com

*Counsel for Lee County (1:19-op-45671-
DAP)*

/s/ Peter J. Mougey

Peter J. Mougey (FL Bar No. 191825)
LEVIN, PAPANTONIO, RAFFERTY,
PROCTOR, BUCHANAN, O'BRIEN,
BARR, MOUGEY, P.A.
316 South Baylen Street

Pensacola, FL 32502
(850) 435-7000
pmougey@levinlaw.com

Counsel for Bay County (1:18-op-45455-DAP)
City of Bradenton (1:18-op-46331-DAP)
City of Miami Gardens (1:18-op-45873-DAP)
City of New Port Richey (1:19-op-46073-DAP)
City of Niceville (1:21-op-45081-DAP)
City of North Miami (1:18-op-45872-DAP)
City of Ormond Beach (1:19-op-46121-DAP)
City of Panama City (1:18-op-45373-DAP)
City of Pensacola (1:18-op-45331-DAP)
City of Pinellas Park (1:18-op-45807-DAP)
City of Saint Petersburg (1:18-op-45701-DAP)
City of Tallahassee (1:18-op-46243-DAP)
Escambia County (1:18-op-45729-DAP)
Gulf County (1:18-op-45953-DAP)
Hernando County (1:19-op-45667-DAP)
Jackson County (1:19-op-45283-DAP)
Leon County (1:18-op-46242-DAP)
Miami-Dade County (1:18-op-45552-DAP)
Pasco County (1:18-op-45851-DAP)
Pinellas County (1:18-op-45742-DAP)
Santa Rosa County (1:18-op-45861-DAP)
Volusia County (1:18-op-45782-DAP)

/s/ Michael C. Moore
Michael C. Moore
MIKE MOORE LAW FIRM, LLC
P.O. Box 321048
Flowood, MS 39232
(601) 933-0070
mm@mikemoorelawfirm.com

Counsel for Hillsborough County (1:18-op-46281-DAP) and City of Tampa (1:18-op-46282-DAP)

/s/ James D. Young
James D. Young (FL Bar No. 567507)
MORGAN & MORGAN COMPLEX
LITIGATION GROUP
76 S. Laura Street, Suite 1100
Jacksonville, FL 32202

(904) 361-0012
(904) 366-7677 (Fax)
jyoung@forthepeople.com

Counsel for City of Deerfield Beach (1:18-op-45021-DAP)
City of Fort Lauderdale (1:18-op-46329-DAP)
City of Hallandale Beach (1:18-op-45119-DAP)
City of Lauderhill (1:18-op-45119-DAP)
The County Commission of Monroe County (1:18-op-45273-DAP)
City of Orlando (1:20-op-45223-DAP)
City of Miramar (1:19-op-45088-DAP)
City of Pembroke Pines (1:18-op-46363-DAP)

/s/ Sara D. Aguiniga
Sara D. Aguiniga
MOTLEY RICE LLC
401 9th Street, NW, Suite 630
Washington, DC 20004
(202) 232-5504
saguiniga@motleyrice.com

Counsel for City of Clearwater (1:19-op-45009-DAP), and City of Miami (1:19-op-45335-DAP)

/s/ Shayna E. Sacks
Shayna E. Sacks
NAPOLI SHKOLNIK, PLLC
360 Lexington Avenue, 11th Floor
New York, NY 10017
(212) 397-1000
ssacks@napolilaw.com

Counsel for Alachua County (1:18-op-45685-DAP)
Levy County (1:18-op-46119-DAP)
Okaloosa County (1:19-op-45894-DAP)
Osceola County (1:18-op-45669-DAP)
Palm Beach County (1:18-op-46121-DAP)
Walton County (1:19-op-45423-DAP)

/s/ William E Robertson Jr.
William E Robertson Jr. (FL Bar No. 436607)

THE ROBERTSON LAW FIRM PA
1990 9th Street, Suite 100
Sarasota, FL 34236
(941) 364-2455
bill@robertson.law

Counsel for City of Palmetto (1:18-op-46055-DAP) and City of Sarasota (1:18-op-45513-DAP)

/s/ Eric Romano
Eric Romano (FL Bar No. 120091)
ROMANO LAW GROUP
801 Spencer Drive
West Palm Beach, FL 33409
(561) 533-6700
(561) 533-1285 (Fax)
eric@romanolawgroup.com

Counsel for Bradford County (1:19-op-45564-DAP)

City of Apopka (1:19-op-45883-DAP)
City of Coral Springs (1:19-op-46123-DAP)
City of Daytona Beach (1:19-op-45598-DAP)
City of Daytona Beach Shores (1:19-op-45587-DAP)
City of Deltona (1:19-op-45586-DAP)
City of Florida City (1:19-op-45980-DAP)
City of Fort Pierce (1:19-op-45595-DAP)
City of Homestead (1:19-op-45980-DAP)
City of Ocala (1:19-op-45834-DAP)
City of Ocoee (1:19-op-45966-DAP)
City of Oviedo (1:19-op-45584-DAP)
City of Palatka (1:19-op-45984-DAP)
City of Palm Bay (1:19-op-46132-DAP)
City of Port Saint Lucie (1:19-op-45596-DAP)
City of Sanford (1:19-op-45599-DAP)
City of Saint Augustine (1:19-op-45592-DAP)
City of Sweetwater (1:19-op-45914-DAP)
Clay County (1:19-op-45591-DAP)
Dixie County (1:19-op-45604-DAP)
Gilchrist County (1:19-op-45605-DAP)
Hamilton County (1:19-op-45589-DAP)
Lake County (1:19-op-45588-DAP)
Manatee County (1:19-op-45044-DAP)
Marion County (1:19-op-45272-DAP)
Orange County (1:19-op-45797-DAP)

Putnam County (1:19-op-46122-DAP)
Saint Johns County (1:19-op-45563-DAP)
Saint Lucie County (1:19-op-45656-DAP)
Seminole County (1:19-op-45565-DAP)
Suwannee County (1:19-op-45590-DAP)
Taylor County (1:19-op-45597-DAP)
Town of Eatonville (1:19-op-46014-DAP)
Union County (1:19-op-45603-DAP)

/s/ Donald A. Broggi
Donald A. Broggi
SCOTT+SCOTT ATTORNEYS AT LAW LLP
230 Park Avenue, 17th Floor
New York, NY 10169
(212) 519-0518
dbroggi@scott-scott.com

Counsel for City of Jacksonville (1:18-op-46120-DAP)

SO ORDERED this 25th day of May, 2022.

/s/Dan Aaron Polster
Hon. Dan Aaron Polster
United States District Judge